

2011 MAY 27 AM 9:48

May 24, 2011

Michael R. Thornton  
Tennessee Department of Environment and Conservation  
Division of Water Pollution Control  
711 R S. Gass Boulevard  
Nashville Tennessee 37243

RE: Notice of Violation Letter  
Compliance Evaluation Inspection  
NPDES Permit No. TN0074004

Mr. Thornton,

Clarksville Water Treatment Plant personnel are currently correcting all of the violations listed in the Notice of Violation letter dated May 17, 2011. The following are the listed deficiencies, along with the corrections that have been made or are currently being made:

**Bullet #2 – It was not clear if site approval had been obtained for disposal of the WTP sludge at this location (Barge Point Road site).**

I have attached a copy of a letter dated September 21, 2006 from the Division of Water Supply granting approval for the Clarksville Water Treatment Plant to utilize the Barge Point Road site for the disposal of the water treatment plant solids. Our records indicate that we have been utilizing this site since March 2007.

**Bullet #3 – Monitoring for Iron**  
Not Applicable.

**Bullet #4 – Chain of Custody Forms**

We are currently modifying chain of custody forms to utilize for sampling of discharge water. The forms will have spaces for the date, time, and person collecting the sample. Signatures and or initials of technicians/analysts will be required on completed forms. The record keeping for this shall be complete and in order.

**Bullet #5 – Total Residual Chlorine Calibration Checks**

Primary and secondary calibration standards have been ordered for the TRC analyzers. Primary calibrations shall be performed monthly and secondary calibration checks shall be performed prior to the total chlorine analysis. The calibrations and calibration checks shall be recorded with results, time, date, and the analyst's initials or signature. The record keeping for this shall be complete and in order.

**Bullet #6 – pH Meter Calibration**

Daily calibrations shall be performed on the pH analyzer. pH buffer solutions and slope results shall be documented along with date, time, and analyst's initials or signature. The record keeping for this shall be complete and in order.

**Bullet #7 – Total Suspended Solids and Setteable Solids Records**

Proper documentation including formulas, date, time, and analyst's initials or signature shall be performed for all TSS and SS analyses. The record keeping (Report of Analyses Sheet) for this shall be complete and in order.

**Bullet #8 – Total Aluminum Analysis**

Total aluminum samples shall be sent to Environmental Science or another approved laboratory for analysis. EPA Method 200.7 shall be utilized to perform this test. Results shall be sent to the state as well as the Clarksville Water Treatment Plant laboratory for record keeping.

**Bullet #9 – Outfall Sign**

I have attached a photograph of the current outfall sign we have. The outfall sign is posted on the exterior wall of the raw water intake (facing south). We are currently constructing a new and larger sign that will have updated phone numbers listed and will continue to meet permit requirements.

It is our full intent to meet all requirements pertaining to the NPDES Discharge Permit and we have made or are currently making the changes necessary to do so. I appreciate the deficiencies being brought to my attention and I welcome you back for a follow up inspection at your convenience.

We are and will remain committed to providing the most accurate laboratory results possible.

Respectfully,



Chris Lambert

Water/Wastewater Operations Manager,  
Clarksville Gas and Water Department

Cc: Erich Webber, Division of Water Supply



TDEC  
NASHVILLE  
FIELD OFFICE  
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Chris Wade  
Fax copy to KRSTATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
DIVISION OF WATER SUPPLYNashville Environmental Assistance Center  
537 Brick Church Park Drive  
Nashville, Tennessee 37243-1550

September 21, 2006

Mr. John R. Markham, Jr., P.E.  
Gresham, Smith and Partners  
1400 Nashville City Center  
511 Union Street  
Nashville, Tennessee 37219RE: Beneficial Water Plant Solids Application Sites  
Clarksville Water Department  
PWSID# 0000116 Montgomery County

Dear Mr. Markham:

On August 9, 2006, Louis Burnett from the Division of Water Supply visited the North Clarksville Water Treatment Plant Site to evaluate the proposed land application site for the beneficial use of water treatment plant solids located on Barge Point Road. Based upon observations made during the visit, the sites that were inspected should be satisfactory for the application of water plant solids provided the Clarksville Water Department abides by the following conditions:

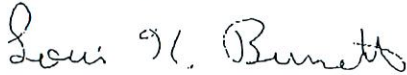
1. Buffer zone distances measured from the area of application must be:
  - a. 250 feet from dwellings;
  - b. 20 feet from road;
  - c. 200 feet from surface water;
  - d. 500 feet from private wells;
  - e. 4 feet (vertical) from water table.
2. The rate of water plant solids application must be carefully monitored to ensure that the water plant solids stay within the immediate area of application.
3. The solids should be incorporated into the soil following application in order to minimize runoff and eliminate any odors or pests.
4. The solids should not be applied during rainfall, when rainfall is expected, or when the soil is saturated.

Mr. Markham  
September 21, 2006  
Page 2

5. The Division is not responsible for the consequences of failure to employ reasonable judgment by the Clarksville Water System in application of the water plant solids if it results in any negative environmental impact. The Division must be notified of any complaints regarding the application of the solids.

If you have any questions concerning this letter, please contact me at 687-7031.

Sincerely,




Louis K. Burnett  
Manager, Division of Water Supply  
Nashville Environmental Assistance Center

cc: Clarksville Water Department  
Central Office  
File









TREATED INDUSTRIAL WASTEWATER  
CLARKSVILLE MUNICIPAL WATER TREATMENT PLANT  
PHONE (615) 553-2440  
NPDES PERMIT NO. TN0074004  
TENNESSEE DIVISION OF WATER POLLUTION CONTROL  
(615) 226-6918 WPC NASHVILLE FIELD OFFICE